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COMMONWEALTH of VIRGINIA

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February 4, 1992

Jesse Waltz
Atlantic Division Naval Facilities
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Code 1822
Norfolk Naval Base
Norfolk, VA 23511-6287

Dear Mr. Waltz

We have reviewed the RCRA Facility Investigation Work Plan for the Oceana Naval Air Station dated September 1991 and have the following comments.

Surface Water

Attachment B lists hazardous constituents, practical quantitation limits (PQLs), and suggested test methods. The mercury PQL for water of .002 ppm is considerably higher than the fresh water chronic criterion of .012 ppb. We request that the method detection limit be used instead of the PQL in the case of mercury. We feel that copper should be included on the list of inorganic analytes in Attachment B. The chronic criterion for copper in surface water with a hardness of 100 mg/l as $CaCO_3$ is 12 ppb and with a hardness of 200, is 21 ppb. Therefore, the level of detection for surface water analysis should be low enough to detect copper at relatively low concentrations.

Since toxicity of some metals to aquatic life is influenced by hardness of the water, we request that hardness be included in analysis of surface water samples.

SWMU 1--West Woods Oil Disposal Pit

Metals analysis is not proposed at this site. Based on the type of waste reportedly disposed of in the pit, we suggest metals analysis be included.

Both the Initial Assessment Report (page 8-1) and the August 1988 draft RCRA Facility Assessment (page 72) mention a trench or ditch that operated is association with the pit. Apparently it was used to transfer waste to the pit when truck access was not possible and wastes dumped into the trench were ignited. According to the draft RFA, the ditch was located during a 1984 field check. If reports of a ditch are correct, the proposed sampling program should be designed to detect contamination from it as well as the pit.

Line Shack Oil Disposal Sites

Waste oil and aircraft maintenance chemicals were disposed of at these sites. Therefore, we think metals and polynuclear hydrocarbons are potential contaminants at these sites and request that these be included in the analyses.

SWMU 11--Fire Fighting Training Areas

The report states that two additional wells downgradient of the site will be installed. Figure 4-5 shows two wells labelled 11-MW3. The well 11-MW3 directly west of the old pit seems to be in a good location to detect contamination from the old pit and we recommend a well in this general location. Well 11-MW2 and the other well 11-MW3 appear to be in good locations to detect contaminants from the new pit. Could three wells be installed at this site?

SWMU 26--Fire Fighting Training Area

Parameters proposed for analysis here do not include lead which was included for site 11. If the fuel/waste oil that was burned here might have contained lead, we request that sample analysis include lead. (Lead is listed as a suspected contaminant at this site in Table 3-3).

SWMU 15--Abandoned Tank Farm

Tables 3-3 and 3-5 list chlorinated and volatile organic compounds as suspected contaminants at SWMU 15. Should the proposed testing

for aromatic volatiles be broadened to include all volatile organic compounds at this site?

SWMU 21--Transformer Storage Yard

We request that total petroleum hydrocarbon analysis be included at this site since petroleum usually serves as a vehicle for carrying PCBs.

SWMU 22--Construction Debris Landfill

The report states that the site is located in a low-lying area with wetlands to the northwest. We request that sediment and surface water samples be taken in the wetlands area and tested for volatile organic compounds, metals, pesticides, and PCBs.

SWMU 25--Inert Landfill

The effect of a discharge of water from the pit on water quality in the "receiving waters" would be a concern here. We request that the field work include physical investigation of the pit to determine if there is a discharge to a stream system. If there is a discharge from the pit, we request that the downstream surface water and sediment be sampled and tested for VOCs, semi-volatiles, pesticides and metals.

Thank you for giving us the opportunity to comment. If you have any questions, please call me at (804) 371-8713.

Sincerely,

Anne M. Field
ARAR's Coordinator

AMF/rw

cc: Erica Dameron